

Mr. Paul V. Rosasco  
Project Coordinator  
Engineering Management Support, Inc.  
7220 West Jefferson Avenue, Suite 406  
Lakewood, CO 80235

Dear Mr. Rosasco:

The U.S. Environmental Protection Agency has reviewed the August 28, 2015 submittal titled, "Revised Work Plan for Additional Characterization of Extent of Radiologically-Impacted Material in Areas 1 and 2 West Lake Landfill Operable Unit-1, Bridgeton, Missouri," as prepared by Engineering Management Support, Inc. (EMSI) on behalf of Cotter Corporation (N.S.L.), Bridgeton Landfill, LLC., Rock Road Industries, Inc. and the United States Department of Energy (the Respondents).

The EPA is approving the following elements of this work plan for immediate execution:

- Scope of Work and Objectives of the Investigation
- Field Investigation and Sample Collection and Analyses
- Schedule of defined activities from Mobilization through Data Validation.

The EPA also expects every effort will be made to minimize durations of the various approved scheduled activities, as discussed in the work plan and prior technical meeting. In general, performance of the fieldwork is clearly based on sonic drilling method and verified in our discussion on September 2, 2015; therefore, employment of other methods such as geoprobe and/or hollow stem auger rig(s) should in theory significantly shorten this activity's duration. As with prior Phase 1D fieldwork, potential schedule delays should be minimal (e.g., days not weeks) if caused by changing field drilling equipment to complete this investigation. If the sonic rig is not readily available, some other sample locations would still be amenable to the hollow stem auger method and could proceed while the sonic rig is mobilized on site.

The EPA is also approving the work plan's reporting section with regards to content but does not, however, approve the associated schedule durations identified under the Data Evaluation and subsequent Report portions. As previously discussed in the August 13, 2015 technical meeting and on September 2, 2015, these activities are not entirely linear. While some overlap time has been built into the revised schedule between these activities, it still does not reflect durations in the EPA's prior comment 3b submitted in our August 21, 2015 letter. Also, a deliverable for the submittal of the final revised report needs to be added to the schedule. Documentation of these changes, via submittal of change page(s), shall then be submitted to the EPA for approval within seven calendar days of receiving this letter.

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Site Name: Westlake Landfill		Site ID: 0714			
Name	Vann	Stoy	Field	Peterson	
Branch	MOKS <i>fu</i>	CNSL	MOKS	SUPR	
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Date	9/3/15	9/3/15	9/3/15	9-3	



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If you have any questions regarding this letter or need further clarification on our comments, please email or contact me at (913) 551-7611.

Sincerely,

Brad Vann  
Remedial Project Manager  
Missouri/Kansas Remedial Branch  
Superfund Division

cc: Branden Doster, MDNR

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Missouri/Kansas Remedial Branch  
Superfund Division

~~Enclosures~~

cc: Branden Doster, MDNR

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Site Name: Westlake Landfill Site ID: 0714

Name	Vann	Stoy	Field	Peterson	
Branch	MOKS	CNSL	MOKS	SUPR	
Signature					
Date					

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Remedial Project Manager  
Missouri/Kansas Remedial Branch  
Superfund Division

cc: Branden Doster, MDNR

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Deleted: Enclosures1

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by failure to properly reserve in contingency any necessary

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These elements will require further discussion and negotiation with the EPA.

**Page 1: [3] Deleted** **Slugantz, Lynn** **9/2/2015 5:18:00 PM**

) and also needs to add an activity for completing the revised document deliverable.

**Page 1: [4] Deleted** **Stoy, Alyse** **9/1/2015 9:04:00 AM**

Once resolved, these activities can then be memorialized in the Administrative Order on Consent (AOC) for Remedial Investigation/Feasibility Study modification, dated March 3, 1993. Based on the projected duration of the aforementioned and approved work plan activities, resolving these remaining items within the modified AOC should not delay nor impact their completion as long as both parties work in good faith to effectively resolve this matter.

**Page 1: [5] Deleted** **Slugantz, Lynn** **9/2/2015 5:20:00 PM**

Once the changes are approved as final, the responsible parties will be directed to proceed with the remaining elements of this work plan addendum.

**Page 1: [6] Deleted** **Watterson, Sarah** **9/3/2015 12:30:00 PM**

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**Page 2: [7] Deleted** **Watterson, Sarah** **9/3/2015 4:08:00 PM**

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Name	Vann	Stoy	Field	Peterson	
Branch	MOKS	CNSL	MOKS	SUPR	
Signature					
Date					